

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF SOUTH CAROLINA  
CHARLESTON DIVISION

Brian Musgrave,	)	Civil Action No.: 2:25-cv-01823-RMG
	)	
Plaintiff,	)	
	)	
v.	)	
	)	
	)	
Nancy Mace and Jane/John Does 1-5,	)	
	)	
Defendants.	)	
_____	)	

**DEFENDANTS' CONSENT MOTION FOR EXTENSION OF TIME TO FILE REPLIES**

Pursuant to Federal Rule of Civil Procedure 6(b)(1)(A) and Local Civil Rule 6.01 (D.S.C.)—and with Plaintiff's consent—Defendants respectfully move for a seven (7) day extension of time (through August 8, 2025) to file replies to Plaintiff's Response in Opposition to the Motion to Substitute (ECF No. 28) and Plaintiff's Response in Opposition to the Motions to Dismiss (ECF No. 30). Although the United States is not currently a defendant in this action, Defendants are represented by undersigned counsel from the United States Attorney's Office for the District of South Carolina. *See* ECF Nos. 9, 11.

In support of this motion, Defendants state as follows:

1. On July 11, 2025, the United States filed a Motion to Substitute (ECF No. 21) and a Motion to Dismiss (ECF No. 22).
2. On July 11, 2025, Defendant Mace filed a Motion to Dismiss (ECF No. 24).
3. On July 25, 2025, Plaintiff filed a Response in Opposition to the Motion to Substitute (ECF No. 28) and a Response in Opposition to the Motions to Dismiss (ECF No. 30).
4. In addition, on July 25, 2025, Plaintiff filed a Motion to Seal (ECF No. 29) and a Motion for Limited Discovery (ECF No. 31). The current deadline for Defendants to file their

responses to the Motion to Seal and the Motion for Limited Discovery is August 8, 2025. Defendants are not asking for an extension of that deadline.

5. The current deadline for Defendants to file replies in support of the Motion to Substitute and the Motions to Dismiss is August 1, 2025.

6. This deadline has not previously been extended.

7. Defendants respectfully request a seven (7) day extension of time through August 8, 2025, to allow adequate time to prepare the reply briefs. Additionally, since there is overlap between the issues relevant to the Motion to Substitute, Motions to Dismiss, and Motion for Limited Discovery, it would also be more efficient for Defendants' reply briefs to be due August 8, 2025—the same day when Defendants' response to the Motion for Limited Discovery is due.

8. Defendants' request will not affect any other deadlines.

9. Pursuant to Local Civil Rule 7.02 (D.S.C.), the undersigned counsel consulted with counsel for Plaintiff prior to filing this motion. Counsel for Plaintiff consents to this request.

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Respectfully submitted,

BRYAN P. STIRLING  
UNITED STATES ATTORNEY

*s/Kimberly V. Hamlett*

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July 28, 2025